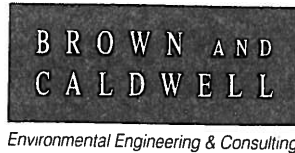


501 Great Circle Road, Suite 150
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February 21, 2001

27-19071.001



Mr. Donald Webster
USEPA Region IV
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: Grenada Manufacturing Facility
Grenada, Mississippi
USEPA ID No.: MSD 007 037 278

Dear Mr. Webster:

In your December 13, 2000 letter to Don Williams, you stated that USEPA required transmittal of a Groundwater Interim Measures Progress Report by February 20, 2001. As you and I discussed by telephone on January 22, 2001, this report can take the form of a letter identifying the current status of groundwater interim measures, anticipated future activities, and a schedule for those activities. This letter serves as the required Groundwater Interim Measures Progress Report.

In October 2000, Geoprobe® groundwater samples were collected from the upper and lower portion of the aquifer near Riverdale Creek. Soil borings were completed at select sampling locations to provide additional aquifer characterization and to determine the elevation of the top of the aquitard. Additionally, two piezometers were installed near Riverdale Creek to supplement groundwater elevations and flow estimates. In conjunction with this Geoprobe® groundwater sampling event, site-wide groundwater sampling was performed. These sampling efforts were outlined in the Interim Measures Work Plan dated June 13, 2000 and approved by you in a letter dated July 20, 2000. Groundwater analyses were performed in accordance with an updated Quality Assurance Project Plan (QAPP) for the site, which was approved in your letter dated December 13, 2000. As stated in the Interim Measures Work Plan, this sampling was performed to update and supplement the existing groundwater database for the site. The results of these sampling activities were summarized in the RFI Report transmitted January 13, 2001. In general, the new groundwater data suggest the need for additional groundwater interim measures.

Some interim measures have already been performed (the on-site vapor extraction activities where soil was excavated, treated, and replaced), are ongoing (NAPL recovery), and/or are in the planning stages (close out of chrome plating operations). While these interim measures have provided obvious benefit to the site, the new groundwater data suggest additional interim measures are appropriate near Riverdale

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Creek. Several technologies have been determined to be potentially appropriate for use as an interim measure at this area of the site. These technologies include:

- Permeable reactive wall (i.e., zero valence iron)
- Air sparging barrier
- Slow release hydrogen compound

Grenada Manufacturing is performing a limited evaluation of these potential interim measures and will select one (or more, in combination) for implementation. This evaluation may take the form of one or more brainstorming meetings, the results of which will be documented for USEPA. Subsequent to receiving concurrence from the agencies on selected interim measures, the selected measures will be designed and installed. The system will then be monitored and its performance included in the overall Corrective Measures Study (CMS) process for the site. In addition to the selected groundwater interim measures, Grenada Manufacturing is proceeding with the close out of its chromium plating operations. Active chrome plating operations were discontinued on January 18, 2001. Use of the Chrome Destruct Pit (SWMU 14) for treating chromium-laden wastewater from the discontinued operations is scheduled to be complete by March 9, 2001. Grenada Manufacturing will submit a Closure Plan for the associated sumps, pits, and the Chrome Destruct Pit by March 20, 2001. That Closure Plan will identify and discuss further closure steps.

Lastly, NAPL recovery efforts were initiated in 1993. These activities included the installation and operation of automated DNAPL and LNAPL recovery units in wells located at AOC A and B, respectively. The amount of NAPL recovered from these areas has decreased over the years to the levels where automated systems are no longer effective. Currently, NAPL is removed manually (i.e., using bailers) from the wells on a monthly basis. These activities are expected to continue.

In summary, Grenada Manufacturing will continue performing NAPL recovery efforts and will continue with its close out of its chrome plating operations. In addition, Grenada Manufacturing will evaluate groundwater interim measures for implementation near Riverdale Creek. Once these interim measures are selected, a design will be prepared and the components installed. To the extent practical at this stage, scheduled activities are outlined below.

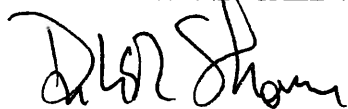
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ACTIVITY	PROPOSED COMPLETION DATE
Evaluate Additional Groundwater Interim Measures	March 9, 2001
Chrome Destruct Pit Liquid Level to be Below Pump Intakes	March 9, 2001
Transmit Chrome Destruct Pit Closure Plan	March 20, 2001
Design for Identified Groundwater Interim Measures	May 18, 2001
Installation of Identified Groundwater Interim Measures	August 3, 2001

Grenada Manufacturing will keep you informed of decisions and schedules, as more details become available. If you have any questions or comments, please feel free to contact me at (615) 250-1241 or by e-mail at dshowers@brwnncald.com.

Sincerely,

BROWN AND CALDWELL



Dale R. Showers, P.E.
Project Manager
Design & Solid Waste

cc: Louis Crawford, MDEQ
John Bozick, Arvin Meritor
Don Williams, Grenada Mfg.
John Kandler, Textron

* 010228
Don Webster & I talk
about this schedule
G.Mfg. will submit
"letter plan w/concepts",
then later submit
full engineering details.
-Lael

will send
design
basis
report.